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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

META PLATFORMS, INC.,

Plaintiff,

v.

BRIGHT DATA LTD.

Defendant.

Case No. 3:23-CV-00077-EMC (AGT)

**JOINT SUBMISSION REGARDING
PROVISIONS IN DISPUTE
CONCERNING THE MODEL
PROTECTIVE ORDER**

**JOINT SUBMISSION REGARDING PROVISIONS IN DISPUTE CONCERNING THE
MODEL PROTECTIVE ORDER**

Pursuant to the Court’s order (Dkt. 131), the parties submit this Joint Submission Regarding Provisions in Dispute Concerning the Model Protective Order. Attached hereto as **Appendix A** is a full version of the Model Protective Order (i) incorporating the parties’ agreed-upon deviations and (ii) including the parties’ competing proposals regarding access to “Highly Confidential” materials by in-house counsel in different highlighted colors (Meta’s in yellow and Bright Data’s in blue). Below is a chart with the disputed paragraph numbers and citations to the corresponding argument made in the parties’ respective briefing in relation to Bright Data’s Motion for Protective Order (Dkts. 106, 107, 112).

Paragraph	Meta’s Argument	Bright Data’s Argument
2.4(*), 7.3(b)(*), 7.4(a)(1), (b), (c) (Designated House Counsel’s access to Highly Confidential – Attorneys’ Eyes Only materials)	Dkt. 107, at pp. 1-2, III.A; Dkt. 108, ¶¶ 14-18	Dkt. 106 at 3-4, III; Dkt. 106-1, Ex. C ¶¶ 1-29, 34; Dkt. 112, III
8(b) (Designated House Counsel’s access to derivative Source Code materials)	Dkt. 107, III.B	Dkt. 106 at 10 n.8; Dkt. 106-1, Ex. C ¶¶ 1-29, 34; Dkt. 112, IV

* Because the parties disagree over whether these two provisions should be added, the numbering within paragraphs 2 and 7.3 may need to be adjusted, depending on the Court’s ruling. Upon the Court’s ruling, the parties are happy to coordinate and jointly resubmit a clean version with the correct numbering.

1 DATED: September 7, 2023

2 Respectfully submitted,

3 /s/ Sonal N. Mehta

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CERTIFICATION

I, Sonal Mehta, am the ECF User whose identification and password are being used to file this document and the supporting document. In compliance with Civil L.R. 5-1(h)(3), I hereby attest that each other signatory has concurred in this filing.

Dated: September 7, 2023

/s/ Sonal N. Mehta
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